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Attorneys for Defendant  
 STEADFAST INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

CAPITOL SPECIALTY INSURANCE  
 CORPORATION, a Wisconsin corporation, as  
 assignee of UNITED CONSTRUCTION  
 COMPANY, a Nevada corporation,

Plaintiff,

vs.

STEADFAST INSURANCE COMPANY, a  
 Delaware corporation; ARCH SPECIALTY  
 INSURANCE COMPANY, a Missouri  
 Corporation; RHP MECHANICAL  
 SYSTEMS, a Nevada corporation; STATE  
 NATIONAL INSURANCE COMPANY,  
 INC., a Texas corporation; and AXIS  
 SURPLUS INSURANCE COMPANY, an  
 Illinois corporation,

Defendants.

CASE NO.: 2:20-cv-01382-JAD-VCF

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND DEFENDANT  
 STEADFAST INSURANCE  
 COMPANY'S DEADLINE TO RESPOND  
 TO SECOND AMENDED COMPLAINT**

**[FIRST REQUEST]**

On March 31, 2022, the Court denied Defendant Steadfast Insurance Company's ("Steadfast") motion to dismiss Plaintiff Capitol Specialty Insurance Corporation's ("Capitol"), as assignee of United Construction Company ("United"), Second Amended Complaint. (ECF No. 89.) Under Federal Rule of Civil Procedure 12(a)(4)(B), a party is given 14 days to file a responsive pleading after a denial of a motion to dismiss, which here is April 14, 2022. Given the complexity of the case and the number of parties in the instant matter, 14 days is an insufficient time period in which to respond. Accordingly, Steadfast and Capitol, in good faith and not for the purpose of

1 delay, hereby agree to extend the deadline for Steadfast to file its responsive pleading for two  
2 weeks, to April 28, 2022, and request that the Court grant such an extension.

3  
4 DATED: April 8, 2022

MORALES FIERRO & REEVES

5  
6 By /s/ Ramiro Morales  
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8 600 Tonopah Drive, Suite 300  
9 Las Vegas, NV 89106  
10 *Attorneys for Defendant* STEADFAST  
11 INSURANCE COMPANY


12  
13 DATED: April 8, 2022

PAYNE & FEARS LLP

14 By /s/ Sarah J. Odia  
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16 Nevada Bar No. 7937  
17 SARAH J. ODIA, ESQ.  
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20 Las Vegas, Nevada 89118  
21 *Attorneys for Plaintiff* CAPITOL  
22 SPECIALTY INSURANCE  
23 CORPORATION

24  
25 ORDER

26 IT IS SO ORDERED.

27   
28 Cam Ferenbach  
United States Magistrate Judge

DATED 4-11-2022

CERTIFICATE OF SERVICE

I, the undersigned, am over the age of eighteen and am an employee at Morales, Fierro & Reeves, and hereby certify that the following document(s) were served on the below date as follows:

**STIPULATION AND [PROPOSED] ORDER TO EXTEND DEFENDANT  
STEADFAST INSURANCE COMPANY'S DEADLINE TO RESPOND TO  
SECOND AMENDED COMPLAINT [FIRST REQUEST]**

**X VIA ELECTRONIC SERVICE:** I caused the above document(s) to be electronically served through the United States District Court's CM/ECF System for the within action, on the participants in this case who are registered CM/ECF users.

I declare under penalty of perjury that the foregoing is true and correct. Dated this 8<sup>th</sup> day of April 2022.

Carol J. Hastings  
Carol J. Hastings